

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA,
et al.,

Debtors.

)
) Chapter 11
)

) Case No. 23-00623 (TJC)
)

) Jointly Administered
)
)

**[PROPOSED] ORDER GRANTING DEBTORS' MOTION FOR ENTRY
OF AN ORDER APPROVING AND AUTHROZING SETTLEMENT
RELATED TO CERTAIN EMPLOYEES' REPAYMENT OF SIGN-ON
BONUSES**

Upon the motion (the "Motion") of the Debtors¹ for entry of an order (the "Order") under Bankruptcy Rule 9019 approving the terms of the compromise and settlement set forth in the Settlement Agreement attached to the Motion as **Exhibit B** and authorizing the Debtors to settle the class of controversies between the Debtors and their employees related to the return of sign-on bonuses; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Public Administrative Order* referring bankruptcy cases entered by the United States District Court for the Northern District of Iowa; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion having been given under the particular circumstances; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best

¹ Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to them in the Motion.

interests of the Debtors, their estates, their creditors, and other parties-in-interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is granted as set forth herein.
2. The terms of the settlement, reflected in the Settlement Agreement between Mercy and Jessica L. Frana attached to the Motion as **Exhibit B**, are fair, reasonable, and in the best interests of the Debtors, their estates, and their creditors, and are hereby approved.
3. Each of the parties to the Settlement Agreement have been duly authorized with full power and corporate authority to execute, deliver and perform their obligations contained in the Settlement Agreement and under this Order.
4. The Debtors are hereby further authorized pursuant to Bankruptcy Rule 9019(b) to compromise and settle the class of controversies with its employees related to return of sign-on bonuses without further notice, hearing, or Court approval.
5. The Debtors are authorized to take all actions necessary to implement the relief granted in this Order.
6. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated and entered this ____ day of January, 2024.

Honorable Thad J. Collins, Chief Judge

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